



CERRO COPPER PRODUCTS CO.

P.O. Box 66800  
St. Louis, MO 63166-6800  
618/337-6000

*Village Progn. Program*

*A 2*

*6/6/90*

June 6, 1990

*114011*

Mr. John A. Thiel  
Horner & Shifrin, Inc.  
5200 Oakland Avenue  
St. Louis, MO 63110

RE: Comments on Draft Discharge Permit Renewal - Permit #108

Dear John:

Cerro Copper Products Co. has reviewed the Draft Discharge Permit per your request during your May 16, 1990 inspection and your submittal dated May 24, 1990. Cerro finds the draft permit acceptable with the exceptions noted below:

A. Monitoring Reports

Part 2 - Paragraph 5 - As requested in my April 11, 1990 letter to Thomas Thompson, Cerro requests that monthly reporting be reduced to quarterly reporting in order to coincide with the U.S.EPA Administrative Order. Also as I understand this requirement, the monthly reporting is for Manhole 30 only. Since Manhole 30, Casting Wastewater Facility, has never been out of compliance since the beginning of operation in October 1988, the monthly reporting appears to be extreme. If the POTW believes that monthly monitoring is required, Cerro requests the following sentence be added after the second sentence: "If laboratory analysis results are not received before the twenty-fifth day of the succeeding month then the monthly report will be submitted ten (10) days following receipt of the laboratory analysis results."

B. Mercury Limits

The draft permit shows the mercury limits to be 0.001 mg/l for the daily maximum and 0.0005 mg/l for the monthly average. In your May 24, 1990 transmittal it was suggested that Cerro review the limit exception criteria outlined in Section 307.1102 (c) (1-4) of the Illinois Pollution Control Board Rules and Regulations, Subtitle C to determine if they apply to Cerro. Cerro cannot determine at this time if the exception criteria can be met; however, by January 1, 1991, Cerro will be in a better position to make the determination.

Cerro does not manufacture nor process mercury. The only use of mercury at Cerro is in a measuring device in the Tube Mill and as of July 1990, the use of mercury will be discontinued in the measuring device.



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Mercury periodically has been found in Manhole 12C, East Outfall, in small concentrations. Cerro believes this is the result of trace mercury in the scrap copper it recycles in the Anode Furnace. The mercury is present in scrubber water discharge. Cerro is currently in the design phase to treat the scrubber water blowdown for all metal contaminants prior to cascading the water to another area of the plant for reuse. Cerro will conduct treatability studies to determine the impact of the proposed treatment on mercury.

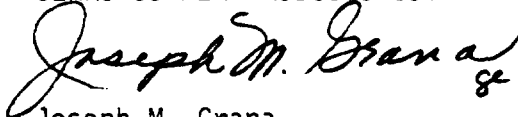
C. Notice of Unlawful Discharge

Part 2 - Paragraph 4: Change paragraph to read "Except for those discharges which are the subject of the monthly compliance reporting requirement in Part 4, Section B, the permittee....". This phrase is needed to prevent duplicate reporting.

If you should have any questions, please feel free to call me.

Very truly yours,

CERRO COPPER PRODUCTS CO.



Joseph M. Grana  
Manager of Environmental  
and Energy Affairs

JMG/ge

cc: George Schillinger

bcc: P. Tandler  
J. Burroughs  
C. Schafer  
S. Franzetti  
File